



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

April 5, 2022

Via ECF

Honorable Naomi Reice Buchwald
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *The New York Times Co. et al. v. Federal Bureau of Investigation*,
21 Civ. 10888 (NRB)

Dear Judge Buchwald:

This Office represents the Federal Bureau of Investigation (“FBI”), the defendant in this action brought by plaintiffs The New York Times Company and Charlie Savage (“Plaintiffs”) under the Freedom of Information Act (“FOIA”).

We write respectfully on behalf of both parties to advise the Court that the parties have reached an agreement on a schedule for FBI’s processing of records responsive to Plaintiffs’ operative FOIA request in this action. FBI intends to make three productions:

1. On or before **May 23, 2022**, the FBI will produce remaining responsive and nonexempt documents pertaining to a shooting incident in Little Rock, Arkansas, as to which Plaintiffs request prioritization.
2. On or before **June 24, 2022**, FBI will review 500 pages of records that are potentially responsive to Plaintiffs’ request and will make a first production of nonexempt records.
3. On or before **July 25, 2022**, FBI will review the remaining records that are potentially responsive to Plaintiffs’ request and will make a final production of nonexempt records.

The parties respectfully request permission to provide a status update by **August 24, 2022**, as to whether further proceedings will be necessary in the action.

Thank you for your consideration of this matter.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: /s/ Samuel Dolinger
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cc: Counsel of record (via ECF)